



## We want to hear from you

EPA invites your comments on the Agency's proposal to take no additional cleanup actions at the Nutting Truck and Caster site. Your input is important because it helps EPA determine the best course of action. There are several ways your voice can be heard during the public comment period that runs from July 15 until midnight Aug. 13, 2010:

- Fill out and mail the enclosed comment form by the deadline.
- E-mail comments to EPA Project Manager Sheila Sullivan at [sullivan.sheila@epa.gov](mailto:sullivan.sheila@epa.gov).

You may also comment at [epa.gov/region5/publiccomment](http://epa.gov/region5/publiccomment)

If there is sufficient interest, EPA will host a public hearing on this proposed plan where you can submit oral and written comments. Contact EPA Community Involvement Coordinator Dave Novak by July 24 to request a hearing by calling 312-886-7478 or 800-621-8431, 8:30 a.m. – 4:30 p.m., weekdays.

For technical questions about the Nutting cleanup, contact:

**Sheila Sullivan**

EPA Remedial Project Manager  
312-886-5251

[sullivan.sheila@epa.gov](mailto:sullivan.sheila@epa.gov)

### Website:

[www.epa.gov/region5/sites/nutting](http://www.epa.gov/region5/sites/nutting)

# EPA Satisfied with Previous Cleanup Actions

## Nutting Truck and Caster Site

Faribault, Minnesota

July 2010

U.S. Environmental Protection Agency Region 5 is proposing no further cleanup actions be taken at the Nutting Truck and Caster Superfund site because previous work done there continues to protect human health and the environment. Soil and underground water supplies at the property were contaminated by a class of chemicals called volatile organic compounds or VOCs from industrial solvents used in the manufacturing process.

EPA placed the site on its National Priorities List in 1983. The NPL is a roster of the nation's hazardous waste sites that are eligible for cleanup under EPA's Superfund program. Minnesota also added the site to its state Superfund list known as the Permanent List of Priorities (PLP). The state removed the site from the PLP last year. EPA would also like to delete the site from its National Priorities List. In order to do so the Agency must first issue an official "proposed plan" outlining cleanup steps that must be taken to protect people and wildlife from exposure to pollutants. This fact sheet is a summary of the more detailed *Proposed Plan for Nutting Truck and Caster Site*, which can be reviewed in the site administrative record (*see back page for locations of the administrative record*).<sup>1</sup>

In the proposed plan, EPA concluded that the actions overseen by the Minnesota Pollution Control Agency since 1980 effectively cleaned up and contained the soil and underground water contamination. Underground water is known as "ground water" in environmental terms.

EPA will not make its proposed cleanup plan final until after it reviews comments received from the public. The Agency will also hold a public meeting if enough people request such a gathering (*see left-hand box for ways you can participate in the decision-making process*). EPA may modify the proposed cleanup plan based on new information or public comments, so your opinion is important.

## Background and history

The Nutting Truck and Caster Co. was located at 1221 Division St. in Faribault. The property consists of 8.6 acres bounded on the west by Prairie Avenue and on the southeast by railroad tracks. The northern property line is about 250 feet south of Division Street. The Cannon River is about one mile north of the site while the Straight River runs a mile east of the area.

Between 1891 and 1984 Nutting manufactured and distributed casters,

<sup>1</sup> Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA known as the Superfund law) and Section 300.430(f)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) require public participation in cleanup decisions. This fact sheet summarizes information contained in the 2010 Proposed Plan for Nutting Truck, Minnesota's 1987 Response Action Plan and other site-related documents available for public review at the Minnesota Pollution Control Agency in St. Paul and EPA Region 5 in Chicago (*see addresses on the back page of this fact sheet*).

wheels, hand trucks, and towline trucks at its Faribault plant. In 1984 the property owners sold Nutting to Faultless, which moved the operation to Watertown, S.D. The owners now run the Prairie Avenue Leasing Co., which leases parcels of the property to service, commercial and industrial firms. Surrounding land contains residences and commercial and light industrial facilities.

A wood shop occupying the central 60,000 square feet of the property was demolished in 1995. A vacant former foundry building sits in the northeast corner of the site. The area between the northern boundary and Division Street is occupied by two private residences, some office buildings and a self-storage facility. All properties in and around the site are connected to the Faribault municipal drinking water supply. At the present time there are no plans for land-use changes on the site or surrounding properties.

### **Contamination and enforcement activities**

Before 1979 foundry and other waste was deposited in an abandoned gravel pit on the site. In 1959 Nutting began using a seepage pit on the northwest corner of the gravel pit in the west central area of the site to deposit waste and sludge including waste solvents. These solvents belong to a class of chemicals called volatile organic chemicals (VOCs). The seepage pit covered 3,200 square feet and was about 13 feet deep. The upper 3-4 feet of the seepage pit consisted of sludge.

Beginning in the late 1970s, Minnesota environmental regulators began investigating the site. Minnesota Pollution Control Agency issued a Notice of Noncompliance to the Nutting Co. in 1979 for its past disposal practices. In response to the notice, Nutting performed what is called a "remedial investigation" (RI) to determine the nature and extent of contamination on and around the site. As a result of the RI, Nutting excavated the waste material and contaminated soil from the former seepage pit, backfilled it with clean soil, and capped the area with concrete in 1980. The section of ground is now used as a loading dock and parking lot for one of the businesses on the property.

In 1982 all five of the Faribault municipal drinking wells showed trace contamination by VOCs, chiefly trichloroethylene (TCE) and 1,2-dichloroethylene (1,2-DCE), a chemical formed when TCE degrades. These chemicals are light and highly mobile in ground water. In 1983 EPA became involved when the site qualified for placement on the Superfund National Priorities List. Superfund sites are sometimes divided into smaller parts called "operable units" or OUs. The Nutting site was split into OU1 – soil, and OU2 – ground water.

In 1984 a legal agreement between Nutting and MPCA required the company to investigate the ground water supplies. Additional RIs were conducted in 1984, 1985 and 1986. Under another legal order from Minnesota regulators, Nutting built and began operating a ground water pump-and-treat system in 1987. The pump-and-treat system keeps the contaminated ground water from moving farther from the site. At the time, the safe limit for TCE concentrations in water was 50 parts of TCE per billion parts of water (parts-per-billion or ppb). A part-per-billion is a tiny amount that can be thought of as one second in 32 years, but even small amounts of toxic material can cause health problems. The treated ground water was discharged to Crocker's Creek through the municipal storm sewer, located about 1,700 feet northwest of the site.

### **Risks to people and the environment**

As mentioned previously, contamination found on-site affected both the soil and ground water. The primary soil contamination was found at the seepage pit where excessive levels of TCE, another chemical called methylene chloride, and heavy metals such as lead and cadmium were detected. The pollutants in the soil and seepage pit continually moved into the ground water, contaminating it. The 1980 excavation and capping of the pit solved that problem and also eliminated the exposure threat to people.

TCE was also the major contaminant of concern found in the ground water under the site. TCE concentrations in the ground water supplies exceeded drinking water standards set by the Minnesota Department of Health. Exposure to excessive levels of TCE over a lifetime can cause increased cancer risks. In the highly industrialized United States, no water, air or soil is free of pollution. The challenge for regulators is deciding at what concentration does a contaminant pose an unacceptable health risk. MDH originally set the maximum safe concentration of TCE in drinking water at 30 ppb. TCE ground water concentrations close to the seepage pit were as high as 570 ppb. The excessive TCE levels in ground water underneath the Nutting site allowed Minnesota authorities to take action and order the company to install the pump-and-treat ground water system. Investigations determined that the contamination beneath the Nutting site was never found to be a source of any contamination of the Faribault municipal well field.

### **In the last 10 years**

Based on the latest research and health data, in 2002 MDH lowered the safe limit for TCE concentrations in drinking water from 30 ppb to 5 ppb. Fortunately, the ground water treatment system was working. A 2003

state report showed TCE levels in the Nutting site ground water dropped below 5 ppb on average after 1989. The pump-and-treat system was shut down in 2004 and has since been dismantled. The wells have been plugged and abandoned because no more VOCs have been found. Since the shutdown, regulators have used "natural attenuation" to remove any traces of TCE in the ground water. These traces are barely detectable. Natural attenuation is a term for simply letting natural processes such as decay, dilution and evaporation work on the pollution. In other developments during the last 10 years:

- In 2004 the city of Faribault closed the municipal drinking water well closest to the Nutting site (1 mile). This action eliminated any chance that people could be exposed to TCE in their drinking water.
- Experts noted no contaminants of concern were ever detected in a series of monitoring wells set up downhill from the Nutting site. And as mentioned previously, residents on and near the site receive their drinking water from the city, not private wells.
- Minnesota authorities imposed "institutional controls" on the site in 2008. Institutional controls are legal requirements such as ordinances, deeds and covenants. MPCA required that no wells be installed on the Nutting property without its approval. Any land-use changes must also be reported to the state so officials can determine if the change will affect the cleanup.

- To date the public has been satisfied with the cleanup actions taken at the site, an important consideration when officials consider future steps. A public meeting held in 2000 prompted little discussion. An official review of the cleanup conducted by MPCA and EPA in 2009 found no concerns from current tenants on the Nutting site. Also, MPCA received no comments on its public notice to delete the site from the PLP.

### **No action justification and next steps**

After examining all the information presented above, EPA concluded the cleanup steps performed under the supervision of Minnesota authorities were sufficient to protect people and the environment from exposure to pollution. Therefore, EPA's official proposed plan recommends that no further action be taken.

EPA encourages the public to comment on this proposal for the Nutting Truck and Caster site. The comment period runs through midnight Aug. 15.

After reviewing all the comments, EPA will decide whether the no action alternative is appropriate and will release a document called a "record of decision" or ROD. Announcement of the ROD will be made in a local newspaper. The ROD will be available for public review in the administrative record for the site kept at MPCA and EPA offices in St. Paul and Chicago, respectively. A summary of all the comments received and EPA's responses will be contained in a "responsiveness summary" attached to the ROD.

# **EPA Concludes Prior Cleanup Actions Are Protecting The Environment**

Nutting Truck and Caster Site  
Faribault, Minnesota

## **Agency Proposal Says No Further Cleanup Work Necessary**

Comment Period: July 13 – Aug. 15, 2010

(details inside)

### **Minnesota contact**

For questions or comments with  
Minnesota officials dealing with  
the Nutting Truck and Caster  
site contact:

**Gary Krueger**

Superfund Program

Minnesota Pollution Control  
Agency

520 Lafayette Road N.

St. Paul, MN 55155

### **Read the documents**

The proposed plan and many  
other official documents, reports  
and investigations are available  
at the MPCA office in St. Paul  
listed immediately above, or at  
EPA Region 5, 7<sup>th</sup> Floor Records  
Center, 77 W. Jackson Blvd.,  
Chicago.

**NUTTING TRUCK AND CASTER SITE: EPA Accepts Previous Cleanup Actions**

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